

Regulatory Advisory

A service to members, advisories are produced whenever there is a significant development that affects the job you do in your community.

JCAHO Announces Their Official Stance on Alcohol-Based Hand Rub Dispensers in *Perspectives*

A Message to ASHE Members:

On March 7, 2006, the Joint Commission (JCAHO) announced their official stance on the use of Alcohol-Based Hand Rubs (ABHR) dispensers in egress corridors in their article *Using Alcohol-Based Hand Rubs to Meet National Patient Safety Goal 7* published in the March 2006 edition of *Joint Commission Perspectives*.

The article specifically distinguishes between gel products and foam products. Joint Commission allows ABHR **gel dispensers** in corridors provided the following conditions are met:

- The corridor width is 6 feet or greater and dispensers are at least 4 feet apart.
- The dispensers are not installed over or directly adjacent to an ignition source such as an electrical outlet or switch. *Adjacent* is defined as being at least 6 inches from the center of the dispenser to an ignition source.
- In locations with carpeted floor coverings, dispensers installed directly over carpeted surfaces are permitted only in sprinklered smoke compartments.

These conditions are consistent with the ABHR amendments to the 2000 and 2003 editions of the *Life Safety Code* (NFPA 101) and the requirements of the 2006 edition of the *Life Safety Code*. This article further clarifies the term “adjacent” (which was not defined in the *Life Safety Code*), reducing it from the 12 inches (from the center of the dispenser) previously reported in the January 2006 edition of *EC News*.

Joint Commission will allow the installation of ABHR **foam dispensers** provided that they meet the location criteria for ABHR gel stating: “Industry experts have indicated that small-quantity ABHR *foam* dispensers *may* be equivalent to ABHR *gel*.”

Therefore, pending further review, the Joint Commission will allow any ABHR *foam* installation that meets the location criteria stated above for ABHR *gel*. Volumes of ABHR *foam* are based on suppliers’ recommendations and in no case exceed the permissible volumes for ABHR *gel* as defined above. In the event that subsequent testing demonstrates a safety concern relating to *foam* dispensers in egress corridors, the Joint Commission reserves the right to modify its position on the acceptability of such installations. In that event, previously installed dispensers would be subject to the newer restrictions; that is, they would not be “grandfathered,” and noncompliant installations would have to be removed.

Assuring an Equivalent Level of Safety through Risk Assessment

In this article, Joint Commission reminds readers of the opportunity to achieve an equivalent level of safety, if all of the requirements for ABHR use cannot be met completely. Because the JCAHO official stance is based on the *Life Safety Code (LSC)*, the concept of performing a risk assessment to determine alternative methods to achieve an equivalent level of safety is valid and appropriate. JCAHO states: “As with other areas of the *LSC*, organizations may not meet all the requirements completely but may still provide an equivalent level of safety through assessing and managing the specific construction, systems, or operation of an area. Likewise, an organization that cannot meet all the requirements outlined in this article may perform a product-specific risk assessment of the ABHR product using product literature and determine alternative methods to achieve an equivalent level of safety.”

The article also discusses permissible volumes of ABHR and the use of ABHR to meet the requirements of National Patient Safety Goal 7. ASHE members are encouraged to **obtain a copy of the entire article through their organization’s JCAHO liaison**. Likewise, ASHE members are encouraged to discuss this article within their organization’s Safety Committee to further refine their organizational policy and procedures regarding the use of ABHR products in improving hand hygiene and reducing healthcare-associated infection.

Since ASHE first collaborated with AHA, CDC, APIC, SHEA and others to address the potential fire safety challenges presented by the use of ABHR, ASHE has maintained a webpage devoted to ABHR at <http://www.ashe.org/ashe/codes/handrub/index.html>. This webpage will continue to be updated to reflect the most current knowledge and guidance on this subject.

For questions or comments contact Dale Woodin, ASHE Deputy Executive Director, at dwoodin@aha.org or 312-422-3812

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